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Federal Communications Commission  
Office of the Secretary

August 19, 2014

VIA COURIER

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

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Attention: Video Division  
Media Bureau

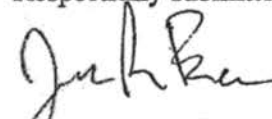
Re: KPXE-TV, Kansas City, Missouri  
Facility I.D. No. 33337  
Petition to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of ION Media Kansas City License, Inc., licensee of commercial television station KPXE-TV, Kansas City, Missouri, we hereby transmit an original and four copies of a *Supplement to Petition for Rule Making* regarding the substitution of Channel 30 for Channel 51 at Kansas City, Missouri in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,



John R. Feore, Jr.

Enclosure

cc: Ms. Joyce Bernstein (via e-mail)

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List ABCDE

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )

Amendment of Section 73.622(i) )  
Post-Transition Table of Allotments, )  
Digital Television Broadcast Stations )  
(Kansas City, Missouri) )  
)

MB Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

To: Office of the Secretary  
Attn: Chief, Video Division  
Media Bureau

**SUPPLEMENT TO PETITION FOR RULE MAKING  
TO AMEND THE DTV TABLE OF ALLOTMENTS**

By its attorneys and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules,<sup>1</sup> ION Media Kansas City License, Inc. ("Licensee"), licensee of KPXE-TV, Kansas City, Missouri (the "Station"), hereby supplements the *Petition for Rule Making* it filed on August 11, 2014 regarding the amendment of Section 73.622(i), the Post-Transition DTV Table of Allotments, to substituting Channel 30 as the Station's post-transition DTV channel in lieu of Channel 51 (the "Petition") by providing a supplemental engineering statement.

As demonstrated in the supplemental engineering statement attached hereto as Attachment A, the proposed Channel 31 noise limited service contour of the Station would be

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<sup>1</sup> 47 C.F.R. §§ 1.401, 73.616, 73.622(a).

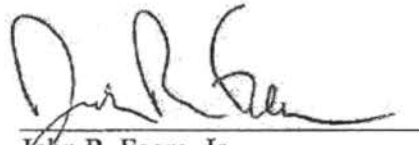
fully within the Station's existing Channel 51 contour.<sup>2</sup> Thus, grant of the Petition would not affect the Commission's repacking flexibility.<sup>3</sup>

For the foregoing reasons, Licensee respectfully requests that the Commission amend the Post-Transition DTV Table of Allotments as proposed. Adoption would serve the public interest by permitting the Station to serve more viewers than it could reach on its current channel.

Respectfully submitted,

ION MEDIA KANSAS CITY LICENSE, INC.

By:

  
\_\_\_\_\_  
John R. Feore, Jr.  
Derek Teslik

Its Attorneys

Cooley LLP  
1299 Pennsylvania Avenue, N.W.  
Suite 700  
Washington, D.C. 20004  
(202) 842-7800

Dated: August 19, 2014

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<sup>2</sup> See Attachment A, Technical Statement at 1.

<sup>3</sup> See *Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567, 6659, n.658 (2014).

**ATTACHMENT A**

**Technical Exhibit**

TECHNICAL STATEMENT  
IN SUPPORT OF PETITION FOR RULEMAKING  
TELEVISION STATION KPXE-TV  
KANSAS CITY, MISSOURI

This Technical Statement was prepared on behalf of television broadcast station KPXE-TV, Kansas City, Missouri (Channel 51), in support of a Petition for Rulemaking to amend Section 73.622(i) of the FCC Rules to change the KPXE-TV post-transition digital television channel. This statement was prepared to provide additional information related to the repacking flexibility analysis.

In order to evaluate the effect of this proposal on the repacking flexibility in the auction and repacking process, a comparison of the predicted 41 dBu noise-limited service contour coverage was prepared. As indicated in the attached Figure 1, the proposal will not result in any increase in the predicted 41 dBu noise-limited service contour in any direction relative to the licensed Channel 51 facility.

In view of the forgoing, it is concluded that the instant proposal meets the FCC's requirements and that its approval would serve the public interest.



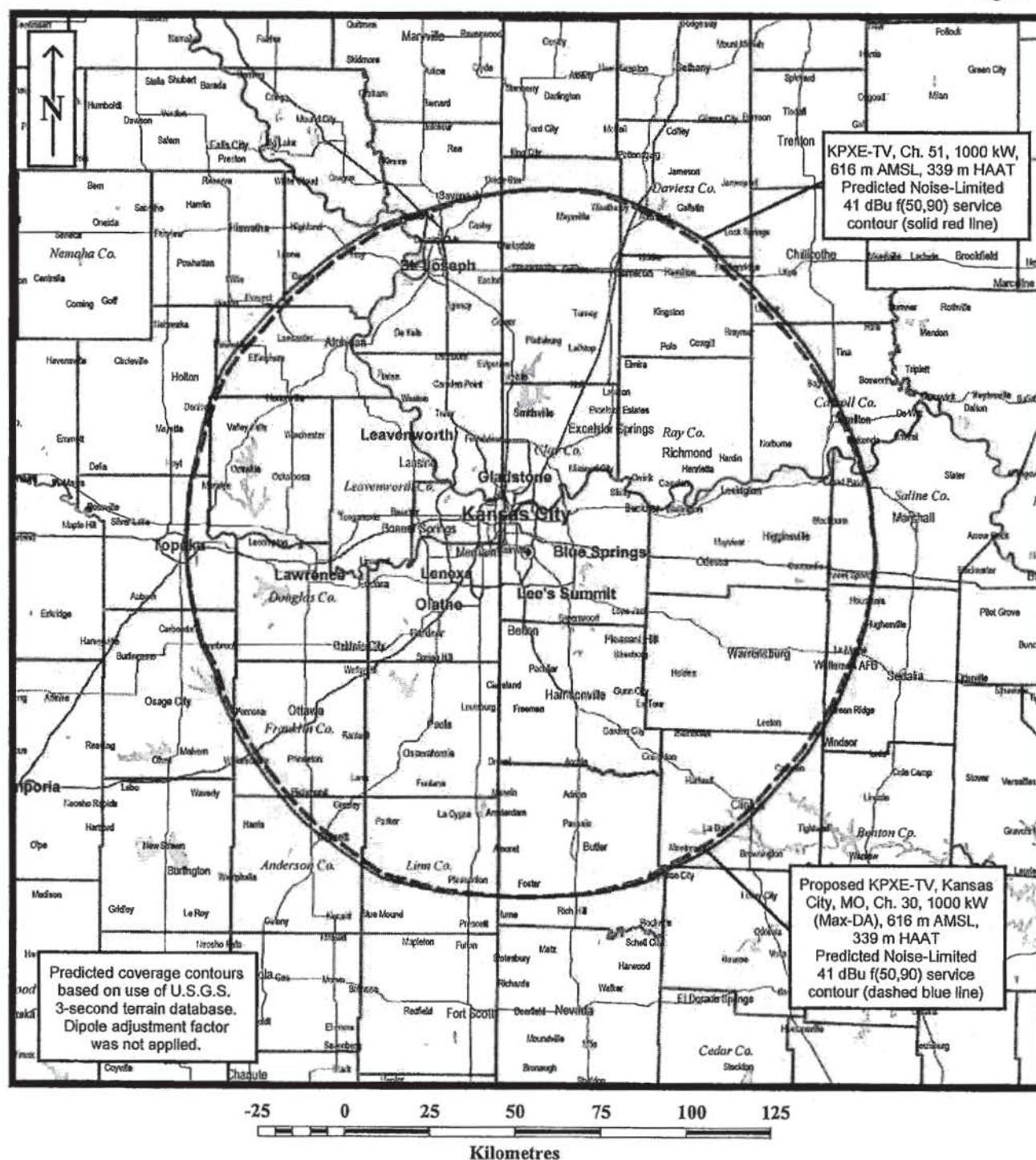
Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, FL 34237

August 18, 2014



Figure 1



## COMPARISON OF PREDICTED 41 DBU COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida